

Massachusetts Department of Public Health

School Health Services Unit

Medication Administration and Epinephrine Training Registration Guidance Document

All primary and secondary public school districts and non-public schools in the Commonwealth are required to comply with [M.G.L. 94C: The Controlled Substances Act](#) and [105 CMR 210.000: The Administration of Prescription Medications in Public and Private Schools](#). Only licensed healthcare professionals may administer prescription medications in Massachusetts primary and secondary schools/districts **unless** the school/school district completes the application for the delegation of administration of medications to unlicensed personnel and/or the application for training on administration of epinephrine by auto-injector by unlicensed school personnel.

This Guidance details the process by which primary and secondary public school districts and non-public schools in the Commonwealth can apply for authorization to allow a school nurse to delegate the administration of prescription medications to unlicensed school personnel. This Guidance also details the process by which primary and secondary public school districts and non-public schools in the Commonwealth can apply to train their staff on the administration of epinephrine by autoinjector.

All primary and secondary schools/districts delegating medications, or training unlicensed personnel to administer epinephrine via auto-injector, or that have stock medications, must obtain a Massachusetts Controlled Substance Registration (MCSR) from the Massachusetts Department of Public Health (MDPH) School Health Unit (SHU). This process is explained in this guidance document.

While 105 CMR 210.000 allows a school committee or board of trustees, in consultation with the board of health, to seek authorization from MDPH SHU to delegate administration of prescription medications to unlicensed school employees, delegation to unlicensed school personnel is not intended to take the place of a school nurse but rather intended to add flexibility to the nurse's daily practice. 105 CMR 210.000 still requires that *"The School Committee or Board of Trustees, in consultation with the Board of Health where appropriate, shall provide assurance that sufficient school nurse(s) are available to provide proper supervision of unlicensed school personnel."*

The 1998 legislative report *Options for Developing School Health Services in Massachusetts* recommended the school nurse to student ratio be 1.0 fulltime equivalent (FTE) professional school nurse (RN) in each building with 250 to 500 students. In buildings with more than 500 students, an additional 0.1 FTE is recommended for each additional 50 students. For buildings with fewer than 250 students, the recommended ratio is 0.1 FTE: 25 students.

In addition to these guidelines, the MDPH SHU recommends that a needs assessment be completed with attention paid to those children with special health care needs, as well as emergency response time for each building. If an application indicates that the nurse to student ratios for any building are greater than 1:750, a letter will be emailed to the school/district noting that the ratios are above recommended levels, and the MDPH SHU reserves the right to deny the application for medication delegation. **Note:** Any school building with less than 1 FTE RN that intends to delegate medications must have an RN on-call via telephone while school is in session and the nurse is not physically present.

Registration Instructions for Medication Delegation & Epinephrine Training

- Fill out the **Staffing Spreadsheet**. Please only include healthcare professionals working in the school health office. Healthcare professionals assigned to an individual student or specific classroom should not be included in the staffing spreadsheet.
- Meet with the signatories review the school/district policies regarding health services, medication administration, and/or epinephrine training at least every other year. All signatories must sign the **Signature Page** annually. Signatures can be scanned and emailed or be an electronic signature (typed signatures will not be accepted).
- Obtain certificates of attendance from the two mandatory BU SHIELD courses, [*Medication Administration in a School Setting: School Nurse Practice in Massachusetts*](#) and [*Medication Administration in Schools: What School Nurse Managers Need to Know*](#). Both classes need to be taken every three years.
- Log onto <https://healthprofessionlicensing.mass.gov/> to submit the staffing/building profile, signature page, and the BU SHIELD certificates. Follow the prompts on the website until the application is fully submitted. If you need assistance with the website please email licensing.helpdesk@mass.gov or call the Help Desk at (617) 973-0935.
- The school/school district's registration expires one year (365 days) from the date on the MCSR. Districts/schools can renew the registration up to 90 days prior to the expiration date.

Key Points for Registering for Medication Delegation & Epinephrine Training

- 1) The Medication Manager (the Medication Manager must be a Registered Nurse in the Commonwealth of Massachusetts) is legally responsible for the management of the medication administration and/or epinephrine training program.
- 2) All registrations must be submitted annually and will expire one year (365 days) from the date on the MCSR. Please note the date your application was approved so that your ability to delegate does not lapse.
- 3) The primary or secondary school/district must have policies for handling, storage, delegation, and disposal of prescription medications and these policies must comply with the laws of the Commonwealth and the regulation 105 CMR 210. The written policies can be requested by MDPH SHU at any time.
- 4) If a primary or secondary school district/school opts to **not** delegate prescription medications to unlicensed personnel, and only practices direct administration by a licensed healthcare professional, registration with the MDPH SHU and a MCSR is not necessary. The handling, storage, administration, and disposal of medications will occur under the license of a healthcare professional.
 - a. A primary or secondary school district/school who is not registered for medication delegation must apply to MDPH SHU for registration to train unlicensed staff to administer epinephrine.
 - b. The storage of any stock medication to be administered by a licensed healthcare professional does require a MCSR through the MDPH SHU.

OPTIONAL Back-Up Medication Manager (RN)

School districts/schools have an option to submit a back-up Medication Manager (RN) with their medication delegation registration application. In the event the primary Medication Manager (RN) leaves their position, or steps down from this registration, the back-up Medication Manager (RN) on this application can immediately fill in as the primary Medication Manager (RN), without lapse of registration. In the event there is no back-up Medication Manager (RN), or the back-up Medication Manager (RN) does not confirm their intention to become the primary Medication Manager (RN) within seven business days, the school district/school's registration will be null and void and the school district/school cannot delegate medication to unlicensed school staff.

- a. The optional back-up Medication Manager (RN) must complete both *Medication Administration in a School Setting: School Nurse Practice in Massachusetts* and *Medication Administration in Schools: What School Nurse Managers Need to Know* and submit the certificates with the application. Both classes need to be taken every three years.
- b. The optional back-up Medication Manager (RN) must be a Registered Nurse in the Commonwealth of Massachusetts.
- c. When the primary Medication Manager (RN) leaves their position, they must inform the MDPH School Health Unit via email at medication.delegation@mass.gov.